

To:
David Malcolm
Head of Planning
Cheshire East Council
Development Management
PO Box 606
Municipal Buildings
Earle Street, Crewe
CW1 9HP

From:
Protect Butterfly Bank Committee
Wilmslow
Cheshire

Date: 27 May 2025

*Subject: Misleading Use of the Term "Grey Belt" by Jones Homes /
Emery Planning – Stockton Farm / Chesham Road / Welton Drive,
Wilmslow*

Dear Mr. Malcolm,

We are writing on behalf of Protect Butterfly Bank, a local community group concerned with the proposed development of Green Belt land off Welton Drive / Stockton Farm, Wilmslow, as part of the current planning promotion by Jones Homes and Emery Planning.

We are formally requesting that Cheshire East Council take urgent action to address the misleading and unofficial use of the term "grey belt" in both:

1. Public-facing consultation materials
2. Formal submissions to the Council, including the current environmental screening document dated 17 March 2025.

Misleading Language in Formal Submissions

**Document EIA Screening Request dated 17 March submitted to CEC
(Ref: 25/1075/EIA)**

Page 2 "At this stage it is anticipated that the application would be submitted in outline with all matters reserved for subsequent approval, except for access. 45% of the dwellings would be affordable in accordance with grey belt policy"

The inclusion of the phrase "in accordance with grey belt policy" in a formal submission to Cheshire East Council is **materially misleading**. It suggests the existence of a planning framework that does not currently exist, applies it prematurely to a site still designated Green Belt, and uses that false basis to justify affordable housing levels.

We request that the Council formally confirm:

- That no such “grey belt policy” exists or applies to this site
- That the land remains designated Green Belt
- That this statement will not be relied on in any future consideration of the planning application

Furthermore, this issue should be explicitly addressed in any Planning Officer report and noted in the consultation record, so that decision-makers are not misled.

While the 2024 NPPF introduces the concept of “grey belt” as a descriptive tool to help local planning authorities assess Green Belt land, it does not create a formal designation or policy framework. More importantly, Cheshire East Council has not carried out any assessment of this site’s contribution to Green Belt purposes, nor has it issued any guidance applying grey belt principles locally. By presenting the proposed housing mix as if it aligns with a defined “grey belt policy,” this statement gives the false impression that the site has already been evaluated or reclassified.

This risks misleading not only the public, but also Council officers and statutory consultees who rely on the accuracy of screening documents in forming their decisions. We request that the Council acknowledge this misrepresentation and ensure that no weight is given to the term “grey belt policy” in the consideration of any forthcoming planning application for this site.

Misleading Public Communications

In addition to the EIA screening document Emery planning on behalf of Jones Homes have also included the term ‘grey belt’ in the following public forums:

1. Their own public consultation document

Source <https://emeryplanning.com/public-consultation/stockton-farm/>

2. Wilmslow.co.uk Article

Quote: “...for up to 120 dwellings on this ‘grey belt’ land.”

Source: <https://www.wilmslow.co.uk/news/article/24586>

Quote: “...for up to 120 dwellings on this ‘grey belt’ land.”

3. Wilmslow Hub News Article

Quote: Identical phrasing referring to development on “this ‘grey belt’ land.”

Source: <https://wilmslow.hub.news/news/local-news/consultation-on-120-new-homes-in-wilmslow-252568>

The repeated use of “grey belt” in public consultation and formal submissions — without any formal assessment, designation, or clarification — risks materially misleading both the public and decision-makers. Cheshire East Council has a legal and procedural duty to ensure that all planning consultations are based on accurate, clear, and honest information, as required under the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework. We ask that the Council take steps to ensure this duty is upheld in the consideration of any future application on this site.

Additionally, under the Council’s Statement of Community Involvement and consultation obligations, the planning process must be clear, accessible, and based on accurate and transparent information. Permitting the use of misleading terminology compromises these duties.

Actions Requested:

1. We respectfully request that the Council confirm that the land at Welton Drive / Stockton Farm remains designated as Green Belt under the adopted Local Plan, and that the term ‘grey belt’ does not constitute a formal planning status, designation, or policy currently applicable to this site.
2. We ask that the Council advise the applicants not to use the term ‘grey belt’ in future planning submissions or consultation materials, unless they clearly explain that the land is designated Green Belt, and that ‘grey belt’ is not a formal designation and does not apply to this site.
3. We ask that planning officers make it clear in any future reports or briefings that the term ‘grey belt’ does not have formal status or designation in planning policy, and that unless or until the Council has formally assessed this site’s contribution to Green Belt purposes, it should not be treated as a material consideration
4. We ask that any Council-led summaries or communications to reflect the above are updated, preventing further confusion or misrepresentation.
5. We ask that the Council formally acknowledge that the reference to “grey belt policy” in the EIA Screening Request (dated 17 March 2025, page 2) is factually incorrect, and confirm that this statement will not be relied upon in the assessment of that EIA screening request or any forthcoming planning application for this site.

We have also submitted a complaint to the Advertising Standards Authority regarding this matter and will provide all supporting evidence upon request.

We appreciate the challenges of managing complex planning proposals and community expectations, and we raise this issue in the spirit of supporting clarity and confidence in the consultation process. We trust the Council will act swiftly to uphold planning policy integrity, public trust, and lawful consultation practice. We look forward to your written response within 14 days.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Turnbull'.

Protect Butterfly Bank Committee
Chair: David Turnbull
hello@protectbutterflybank.co.uk